

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

BEFORE THE FEDERAL ELECTION COMMISSION

SEP 29 4 23 PM '95

In the Matter of)

) MUR 3774
)

AFFIDAVIT OF DAVID N. O'STEEN, PH.D.

This affidavit responds to the Federal Election Commission's SUBPOENA TO PRODUCE DOCUMENTS and the ORDER TO SUBMIT WRITTEN ANSWERS dated August 7, 1995 in MUR 3774. All of the answers herein are given to the best of my knowledge, recollection and belief.

Question 1. To the best of my knowledge, recollection and belief, the following present or former officers, employees, agents and/or volunteers of National Right to Life Committee, Inc. ("NRLC") had knowledge of donations to NRLC by the National Republican Senatorial Committee ("NRSC"):

Wanda Franz, Ph.D.
President
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8800, Ext. 136 (O)

David N. O'Steen, Ph.D.
Executive Director
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8814, Ext. 114 (O)

Darla L. St. Martin
Associate Executive Director
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8826, Ext. 126 (O)

Joleigh Little
Administrative Assistant
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8800, Ext. 153 (O)

Jacki Ragan
Director (State Development and Conventions)
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8800, Ext. 127 (O)

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
OCT 2 9 56 AM '95

1100 203 40 02

Carol Long
Director of NRL PAC
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8808, Ext. 115 (O)

Amarie C. Natividad
Controller
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8816, Ext. 116 (O)

Geline B. Williams
Chairman of the Board of Directors
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(804) 282 8422

Regina Smith
Vice-Chairman of the Board of Directors
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8800 (O)

Anthony Lauinger
Vice-President (June, 1995 - Present)
Treasurer (June, 1991 - June, 1995)
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8800 (O)

Emma O'Steen
Secretary
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8800 (O)

Irene Gatton
Bookkeeper
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8800, Ext. 131

Dennis Day
Treasurer (June, 1995 - Present)

419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8800

Marice Rosenberg
Consultant
966 Redwood Drive
Apple Valley, MN 55124
(612) 432-3753 (H)

Heather Clapsaddle
Assistant to the PAC Director
419 7th Street, N.W.
Suite 500
Washington, D.C. 20004
(202) 626-8800, Ext. 138

Curt Anderson
Consultant
2707 Arden Forest Lane
Bowie, MD 20716
(301) 390-7848 (H)

Robert Powell, deceased.
Vice-President

In addition to the above, there were others among the present or former officers, employees, agents and/or volunteers of NRLC who learned of such contributions after the complaint in this matter was filed.

Question 2. Because of the circumstances surrounding the solicitations and payments, it is impossible to link any particular solicitation of which I have personal knowledge with any particular payment. Therefore, I have answered this question by distinguishing between the solicitations and payments made in 1992 and those made in 1994.

The following answers refer to any solicitations and payments made in 1992:

a. To the best of my personal knowledge, recollection and belief, with respect to any solicitations by NRLC during 1992, I had several meetings during 1992 with Curt Anderson who was then Coalitions' Director with the NRSC. Darla St. Martin of the NRLC may also have been present at the meetings. As stated above, none of those meetings was linked specifically with any particular payment. Rather the substance of the meetings was a solicitation of funds to the NRLC's general fund for the general purposes of the organization.

In addition to the above-referenced meetings, there may have been telephone conversations with Curt Anderson to the same general effect, that is, generalized solicitations of funds for NRLC's general purposes.

b. In addition to Curt Anderson, Jeb Hensarling and Paul Curcio of NRSC were present during one or more solicitations and may also have been spoken with on the telephone.

c. The substance of the meetings was to solicit contributions in order to further the general purposes of the organization, such as building NRLC's base of support, adding to our list of identified pro-lifers, publishing candidate surveys and non-partisan get-out-the-vote efforts.

To the best of my personal knowledge, information and belief, some of the solicitations in which I was personally involved may have taken place on the following dates: January 28, 1992; February 25, 1992; April 2, 1992; and June 29, 1992. I have no information about or recollection of other dates.

I may have told someone at the NRSC that NRLC could possibly make a donation to Christian Coalition. However, I do not remember the date of any such communication or who I may have spoken with.

d. All contributions received in 1992 were deposited into the general 501(c)(4) bank account.

e. The funds were used for the general purposes of the organization, including non-partisan get-out-the-vote telephone calls. In addition, a portion of the November 17, 1992 contribution was donated to the Christian Coalition nationally and the Christian Coalition in Georgia.

In 1992, the following amounts were expended for the following purposes. \$17,372.75 was spent on non-partisan get-out-the-vote phone calls in Georgia. \$15,000.00 was donated to the national Christian Coalition. \$10,000.00 was donated to the Christian Coalition in Georgia.

I was involved in deciding how to use the funds. Carol Long and/or Darla St. Martin may also have been involved in deciding how to use the funds.

The decision as to the use of the funds was based on organizational need and the desire to educate the voters on the issues and urge their participation in the election.

f. I have no other recollection whether any officer, employee, agent or volunteer of the NRLC directly or indirectly

informed any officer, employee, agent or volunteer of the NRSC of any decision regarding the use of any payment.

The following answers refer to any solicitations and payments made in 1994:

a. In 1993 and/or 1994, I had one or more meetings with Bill Harris and Paul Curcio of the NRSC, at which I solicited contributions to NRLC. Carol Long and/or Darla St. Martin may also have attended such meetings or made telephone solicitations. In 1993 and 1994, Curt Anderson was working as a fund-raising consultant for NRLC and also solicited contributions on our behalf.

b. As stated above, in 1994, solicitations were made to Bill Harris and Paul Curcio of the NRSC.

c. One such meeting may have occurred on March 18, 1993. I have no recollection of other dates of any meetings in which such solicitations may have occurred. There may have been one or more meetings initiated by NRLC. The substance of such meetings was NRLC's desire to raise funds for all of its general purposes, including building NRLC's base of support, adding to our list of identified pro-lifers, publishing candidate surveys and non-partisan voter guides, and non-partisan get-out-the-vote efforts.

d. All contributions received in 1994 were deposited into the general 501(c)(4) bank account.

e. Any contributions from NRSC to NRLC in 1994 were used for the general purposes of NRLC as set forth above. I made the decisions regarding the use of such contributions in conjunction with Darla St. Martin and Carol Long.

The decision as to the use of the funds was based on organizational need and the desire to educate the voters on the issues and urge their participation in the election.

f. I have no recollection whether any officer, employee, agent or volunteer of the NRLC directly or indirectly informed any officer, employee, agent or volunteer of the NRSC of any decision regarding the use of any payment in 1994.

Question 3.

The following documents relate to or reference the payments listed in Question 2:

a. Checks, check stubs and/or cover letters evidencing the contributions by NRSC to NRLC on the following dates: October 2, 1992; October 20, 1992; November 17, 1992; October 31, 1994;

November 1, 1994; November 3, 1994; November 4, 1994; attached hereto as Exhibit A.

b. NRLC's Bank statements with respect to Signet Bank, Accounts #6670042008 and #6670042040 the following months: October and November, 1992; and October, November and December, 1994, attached hereto as Exhibit B.

Question 4.

a. No transfers of funds, contributions or other disbursements were made by NRLC to Minnesota Citizens Concerned for Life, Inc. between October 1, 1992 and January 1, 1993.

b. No transfers of funds, contributions or other disbursements were made by NRLC to National Right to Life PAC or Minnesota Citizens Concerned for Life Committee For a Pro-Life Congress between October 1, 1992 and January 1, 1993.

c. NRLC made a \$50,000 contribution to Minnesota Citizens Concerned for Life, Inc. on November 4, 1994. \$5,000 of this was treated as a loan and repaid by MCCL on December 6, 1994. NRLC made contributions of \$35,000.00 and \$17,000.00 to Oregon Right to Life, on October 4, 1994 and November 7, 1994, respectively. NRLC made a contribution of \$3,000.00 to New Jersey Committee for Life on October 17, 1994. NRLC made a contribution of \$5,000.00 to the California Pro-Life Council on November 7, 1994.

Attached hereto as Exhibit C are copies of checks and/or check request forms relating to the above-referenced contributions.

The purposes of the above contributions were to aid the general activities of these organizations including non-partisan voter education and non-partisan get-out-the-vote activities, and in Oregon, activities related to an initiative to legalize assisted suicide.

NRLC made no transfers of funds, contributions or other disbursements to the Pennsylvania Pro-life Federation, Inc. between October 1, 1994 and January 1, 1995.

d. No transfers of funds, contributions or other disbursements were made by NRLC to National Right to Life PAC, Minnesota Citizens Concerned for Life Committee for a Pro-life Congress of the Pennsylvania Pro-life Federation PAC between October 1, 1994 and January 1, 1995.

Question 5.

Of all of the types of activities listed in Question 5, NRLC expended funds only on non-partisan get-out-the-vote telephone calls in connection with the November 24, 1992 U.S. Senate run-off election in Georgia. The total amount expended by NRLC in such activities was \$17,372.75.

Question 6.

Of all of the types of activities listed in Question 6, NRLC expended funds only on non-partisan get-out-the-vote telephone calls in connection with the 1994 general election in Minnesota and Pennsylvania. The total amount expended in Minnesota for such activities was \$50,000. The total amount expended in Pennsylvania for such activities was \$63,544.20.

Question 7.

The following documents relate to or reference the payments listed in Questions 5 and 6:

a. Copies of phone scripts used in non-partisan get-out-the-vote telephone calls in the following elections: the 1992 Georgia Senate run-off election; the 1994 general election in Pennsylvania and the 1994 general election in Minnesota; attached hereto as Exhibit D.

b. Copies of a check and a check request form which relate to non-partisan get-out-the-vote telephone calls in the 1994 Minnesota general election attached hereto as Exhibit E.

c. Copies of checks, check request forms, invoices and letters which relate to non-partisan get-out-the-vote telephone calls in the 1994 Pennsylvania general election attached hereto as Exhibit F.

d. Copies of a check and invoice which relate to non-partisan get-out-the-vote telephone calls in the 1992 Georgia Senate run-off election attached hereto as Exhibit G.

e. NRLC's Bank statements with respect to Signet Bank, Account #6670042008 for the following months: October and November, 1992; and October, November and December, 1994, attached hereto as Exhibit B.

Question 8.

To the best of my knowledge, recollection and belief, no materials were distributed by or on behalf of NRLC in the 1992 general election run-off for U.S. Senate in Georgia.

Question 9.

To the best of my knowledge, recollection and belief, no materials were distributed by or on behalf of NRLC in connection with the 1994 general election in Minnesota or Pennsylvania.

Question 10.

Attached hereto as Exhibit H are copies of NRLC's tax return Forms 990 for 1992 and 1994.

Question 11.

NRLC does not publish an annual report.

Question 12.

To the best of my knowledge, recollection and belief, I am not aware of any officers, employees, agents, or volunteers of NRLC who acted in any of those capacities for the NRSC, the Coverdell for Senate Committee, Santorum '94, or the Rod Grams for U.S. Senate Committee.

Question 13.

To the best of my knowledge, recollection and belief, no materials were distributed by or on behalf of NRLC in Georgia which referenced the 1992 general election run-off, or in Pennsylvania or Minnesota that referenced the 1994 general election.

Question 14.

The following individuals have knowledge of get-out-the-vote activities conducted by or on behalf of NRLC in Georgia in connection with the 1992 general election run-off, and/or in Pennsylvania or Minnesota in connection with the 1994 general election.

- a. David O'Steen, Ph. D., Executive Director.
- b. Darla L. St. Martin, Associate Executive Director.
- c. Carol Long, Director of NRL PAC.
- d. Jacki Ragan, Director (State Development and Conventions).
- e. Marice Rosenberg, Consultant.
- f. Amarie Natividad, Controller.
- g. Irene Gatton, Bookkeeper.
- h. Kel Macdonald, Volunteer.

ED 004 397 0010



I. Joleigh Little, Administrative Assistant.

j. Heather Clapsaddle, Assistant to the PAC Director.

In addition to the above, there were others among the present or former officers, employees, agents and/or volunteers of NRLC who learned of such activities after the complaint in this matter was filed.

Attached hereto as Exhibit I are the addresses of Paul Curcio, Bill Harris, and Jeb Hensarling.

I, David N. O'Steen, being duly sworn, make the statements contained in this affidavit to the best of my personal knowledge, information and belief, under penalty of perjury.

David N. O'Steen
David N. O'Steen, Ph.D.

9/29, 1995

DISTRICT OF COLUMBIA)
:
CITY OF WASHINGTON)

Before me, a Notary Public in and for said City and District, personally appeared David N. O'Steen, and acknowledged the execution of the foregoing instrument and made oath that the information provided therein was made to the best of his personal knowledge, information and belief, and, where based on information and belief, he believes the information to be true.

Witness my hand and notarial seal this 29th day of

SEPTEMBER, 1995.

My commission Expires:

Frene M. Gatton
Notary Public, District of Columbia
My Commission Expires May 14 1998, 19 .

Frene M. Gatton 9-29-95
NOTARY PUBLIC

2001-09-29 10:00:00

2004-07-03

EXHIBIT A

Affidavit of
David O'Steen

NATIONAL REPUBLICAN SENATORIAL COMMITTEE

NON-FEDERAL EXPENDITURES
425 2ND ST., NE.
WASHINGTON, DC 20002

SIGNET BANK
Virginia

1170

OCTOBER 2 1992 88-408/660 1411

PAY **TWENTY FIVE THOUSAND AND 00/100***** DOLLARS \$ **25,000.00**

TO THE ORDER OF
NATIONAL RIGHT TO LIFE COMMITTEE
419 7TH STREET NW, SUITE 500
WASHINGTON, DC 20004

John Mensah
James Y. H. H. H.

⑆00001170⑆ ⑆056004089⑆ 652⑆01699⑆

NATIONAL REPUBLICAN SENATORIAL COMMITTEE
NON-FEDERAL EXPENDITURES

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DELUXE - FORM WVCP-2 V-2

DATE	DESCRIPTION	AMOUNT
10/2/92	PARTY DEVELOPMENT 02-7810 -- 25,000.00 <i>Committee - Pls. keep this w/ Fred 55-510-</i>	25,000.00

A-1

National Republican Senatorial Committee

SENATOR PHIL GRAMM
CHAIRMAN

JEB HENSARLING
EXECUTIVE DIRECTOR

October 2, 1992

Mr. David O'Steen
National Right to Life Committee
419 7th Street N.W., Suite 500
Washington, D.C. 20004

Dear David,

Enclosed please find a \$25,000 contribution from the National Republican Senatorial Committee for your Good Government Activities to be used in a manner consistent with your charter. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

We wish you luck in all your endeavors.

Sincerely,



Paul Curcio
Director of Political Services

RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

2000 2000 2000 2000 2000

National Republican Senatorial Committee

A-2

SENATOR PHIL GRAMM
CHAIRMAN

JEB HENSARLING
EXECUTIVE DIRECTOR

October 20, 1992

Mr. David O'Steen
National Right to Life Committee
419 7th Street N.W., Suite 500
Washington, D.C. 20004

Dear David,

I am happy to send you a \$15,000 contribution from the National Republican Senatorial Committee for your Good Government Activities to be used in a manner consistent with your charter. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

Once again, we are happy to provide this support, and we wish you luck in all your endeavors.

Sincerely,



Paul Curcio
Director of Political Services

NATIONAL REPUBLICAN SENATORIAL
COMMITTEE

NON-FEDERAL EXPENDITURES
425 2ND ST., NE.
WASHINGTON, DC 20002

SIGNET BANK
Virginia, VA

1181

OCTOBER 20 19 92

88-408/580 1411

PAY **FIFTEEN THOUSAND AND 00/100***** DOLLARS \$**15,000.00**

TO
THE
ORDER
OF

NATIONAL RIGHT TO LIFE COMMITTEE
419 7TH STREET NW, SUITE 500
WASHINGTON, DC 20004



00001181 056004089 652001899

National Republican Senatorial Committee

SENATOR PHIL GRAMM
CHAIRMAN

JEB HENSARLING
EXECUTIVE DIRECTOR

November 17, 1992

Mr. David O'Steen
National Right to Life Committee
419 7th Street N.W., Suite 500
Washington, D.C. 20004

Dear David,

I am happy to send you a \$45,000 contribution from the National Republican Senatorial Committee for your Good Government Activities to be used in a manner consistent with your charter. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

We are happy to provide this support, and we wish you luck in all your endeavors.

Sincerely,



Paul Curcio
Director of Political Services

RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
NON-FEDERAL EXPENDITURES

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM WVCP-2 V-2

DATE	DESCRIPTION	AMOUNT
11/17/92	TRANSFER 02-7840 -- 45,000.00 <i>Committee</i> <i>55-570</i>	45,000.00

A-4

NATIONAL REPUBLICAN SENATORIAL
COMMITTEE
NON-FEDERAL EXPENDITURES
425 2ND ST., NE.
WASHINGTON, DC 20002

SIGNET BANK
Virginia VA

1315

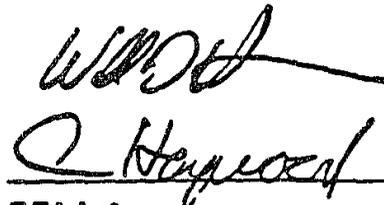
OCTOBER 31 19 94

68-408/580 1411

PAY ****FIFTY THOUSAND AND 00/100******* DOLLARS \$ ****50,000.00****

TO
THE
ORDER
OF

NATIONAL RIGHT TO LIFE
419 7TH STREET, NW
SUITE 500
WASHINGTON, DC 20004
ATTN: CAROL LONG



⑈00001315⑈ ⑆056004089⑆ 652⑈016994⑈

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
NON-FEDERAL EXPENDITURES

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DELUXE - FORM WVCP-2 V-2

DATE	DESCRIPTION	AMOUNT
10/31/94	CONTRIBUTION - 7820000	50,000.00

National Republican Senatorial Committee

SENATOR PHIL GRAMM
CHAIRMAN

WILLIAM D. HARRIS
EXECUTIVE DIRECTOR

A-45

November 2, 1994

Ms. Carol Long
National Right to Life Committee
419 7th Street N.W., Suite 500
Washington, D.C. 20004

Dear Ms. Long:

Enclosed please find a \$50,000 contribution from the National Republican Senatorial Committee's non-federal account. The National Republican Senatorial Committee routinely makes contributions to charitable and tax-exempt organizations such as the National Right to Life Committee. This contribution to your organization should be used for good government activities that are consistent with your organization's not-for-profit character. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

Sincerely,

Edwina Rogers
Edwina Rogers

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
NON-FEDERAL EXPENDITURES

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DELUXE - FORM WVCP-2 V-2

DATE	DESCRIPTION	AMOUNT
11/01/94	CONTRIBUTION - 7820000	50,000.00

National Republican Senatorial Committee

A-6

SENATOR PHIL GRAMM
CHAIRMAN

WILLIAM D. HARRIS
EXECUTIVE DIRECTOR

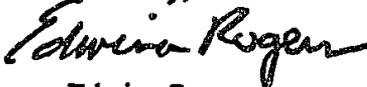
November 3, 1994

Ms. Carol Long
National Right to Life Committee
419 7th Street N.W., Suite 500
Washington, D.C. 20004

Dear Ms. Long:

Enclosed please find a \$60,000 contribution from the National Republican Senatorial Committee's non-federal account. The National Republican Senatorial Committee routinely makes contributions to charitable and tax-exempt organizations such as the National Right to Life Committee. This contribution to your organization should be used for good government activities that are consistent with your organization's not-for-profit character. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

Sincerely,



Edwina Rogers
General Counsel

RONALD REAGAN REPUBLICAN CENTER
425 SECOND STREET, N.E. • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE.

020.011.597.0927

A-6

NATIONAL REPUBLICAN SENATORIAL
COMMITTEE
NON-FEDERAL EXPENDITURES
425 2ND ST., NE.
WASHINGTON, DC 20002

SIGNET BANK
Virginia

1317

NOVEMBER 3 19 94

68-408/580 1411

PAY **SIXTY THOUSAND AND 00/100** ***** DOLLARS **\$60,000.00** **

TO
THE
ORDER
OF

NATIONAL RIGHT TO LIFE
419 7TH STREET, NW
WASHINGTON, DC 20004

⑈00001317⑈ ⑈056004089⑈ 652⑈0169944⑈

NATIONAL REPUBLICAN
SENATORIAL COMMITTEE
NON-FEDERAL EXPENDITURES

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY - NO RECEIPT DESIRED.

DELUXE - FORM WVCP-2 V-2

DATE	DESCRIPTION	AMOUNT
11/03/94	DONATION - CORPORATE DOLLARS	60,000.00

V2

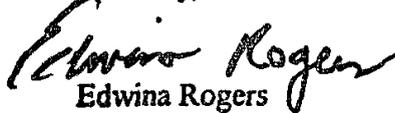
DATE	DESCRIPTION	AMOUNT
11/04/94	CONTRIBUTION -	15,000.00

Ms. Carol Long
National Right to Life Committee
419 7th Street N.W., Suite 500
Washington, D.C. 20004

Dear Ms. Long:

Enclosed please find a \$15,000 contribution from the National Republican Senatorial Committee's non-federal account. The National Republican Senatorial Committee routinely makes contributions to charitable and tax-exempt organizations such as the National Right to Life Committee. This contribution to your organization should be used for good government activities that are consistent with your organization's not-for-profit character. Please note that utilizing any of this money in any way to influence a federal election is strictly prohibited.

Sincerely,



Edwina Rogers
General Counsel

NATIONAL REPUBLICAN SENATORIAL
COMMITTEE

NON-FEDERAL EXPENDITURES
425 2ND ST., NE.
WASHINGTON, DC 20002

SIGNET BANK
Virginia

1318

NOVEMBER 4 19 94

88-408/660 1411

PAY FIFTEEN THOUSAND AND 00/100***** DOLLARS \$15,000.00**

NATIONAL RIGHT TO LIFE
419 7TH STREET, NW
WASHINGTON, DC 20004
ATTN: CAROL LONG

TO
THE
ORDER
OF

Carol Long

⑆00001318⑆ ⑆056001089⑆ 652⑆0169944⑆

A 7

ED. 04, 337, 0037

EXHIBIT C

Affidavit of
David O'Steen



NATIONAL LIFE

Committee, Inc.

CHECK REQUEST NO. _____

Amount: \$35,000.00 Date: 10-4-94

Requested by: Debi Ryan

Pay to: Green Right to Life

Mail to: _____

Address: _____

Address: _____

Carl Vozka

Explanation: Grant to assist in fighting pro-abortansia

initiative in Oregon 24-876 25,000.00

22-844 - 5,000.00

57-890 5,000.00

Charge to: Performance Center No. _____ Account No. Open to Joe Ryan

Account Name: _____
Date Check Required: _____
Note: When charging more than one account list each P.C. No. and Account No. and amount to be charged on back of this form.

Approved by: _____

OCT 04 1994

[Signature]
(Executive Director)

FF-1 (11/81)

(Manager)

BY 6035

(Executive Director)

ENDORSE HERE

PAY TO THE ORDER OF
U.S. NATIONAL BANK OF OREGON
FOR DEPOSIT ONLY
124-0008-258
OREGON RIGHT TO LIFE

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
RESERVED FOR FINANCIAL INSTITUTION USE

162 55756

P-110 24-82 P-110
17
P-1100002104

19099 1228

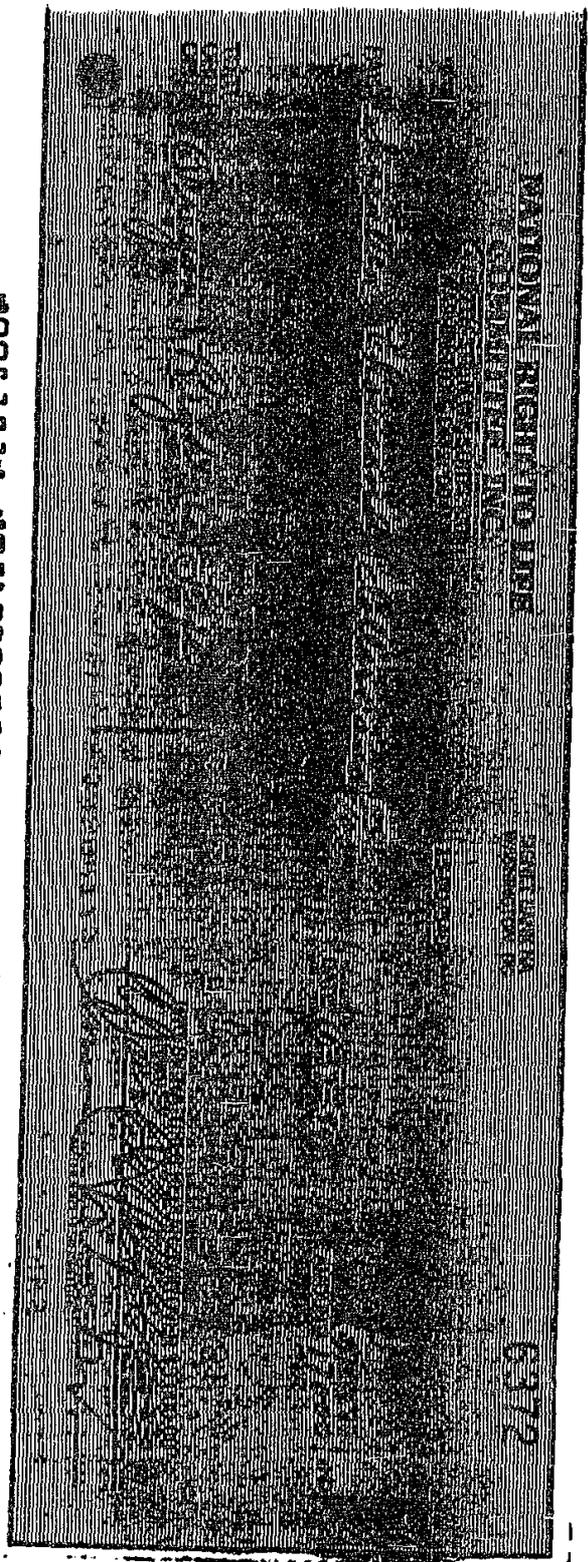
45444117 11-14-84 111714754

NO 94 11
071000013

00410000 8525-0027-8
040471644 11-14-84

SIGNET BANK / NA
054000807
0428110 11-14-84 111714754

0000011000 80024004259 054000807 05370042008 006372



NATIONAL RIGHT TO LIFE

11-14-84

0372

20-04-307-0837

**8 National
RIGHT TO LIFE
Committee, Inc.**

CHECK REQUEST NO. _____

Amount: \$ 17,000.00 Date: 11/7/94

Requested by: David A. Steen

Mail to: DB Leigh

Address: _____

Pay to: Bregyn Right to Life

Address: _____

Explanation: Special TV project

Charge to: Performance Center No. _____

Account No. _____

Account Name: _____

Note: When charging more than one account
list each P.C. No. and Account No.,
and amount to be charged on back of
this form.

Date Check Required: _____

EDDY

11/1/94
DR # 7312

Approved by: _____

(Manager)

(Executive Director)

ENDORSE HERE

Pay to the Order of
707 BANK OF CALIFORNIA 707
National Bank of California Association
FOR DEPOSIT ONLY
CALIFORNIA PRO LIFE COUNCIL, INC.
07073-10070

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE.
RESERVED FOR FINANCIAL INSTITUTION USE.

▶ 1210003584 S
BAC 1453 MARKET ST, CA 23
11/68/94 0707310070 #0

00251770

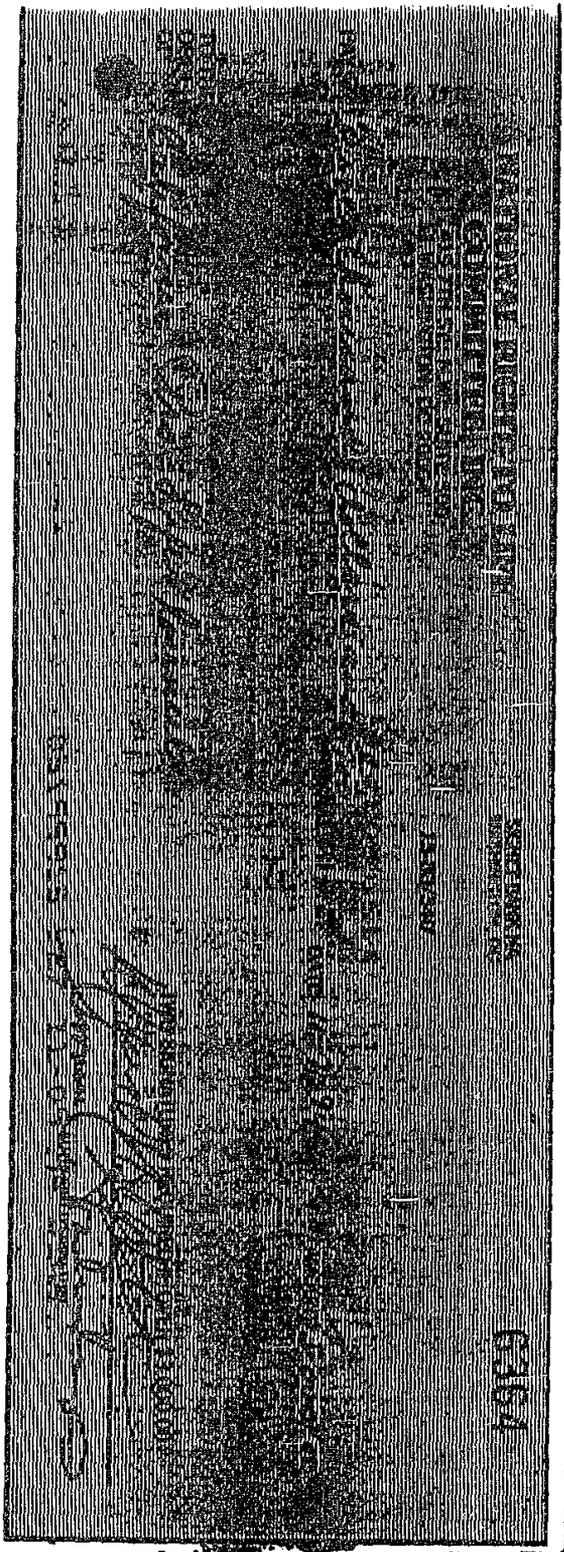
NO '94 09

SIGNET BANK NA

004004807
11-09-94

11-09-94

⑈0000050000⑈ ⑈8002⑈000199⑈ ⑈20800050⑈ ⑈498900⑈



1984

**National
RIGHT TO LIFE**

Committee, Inc.

CHECK REQUEST NO. _____

Amount: \$ 5,000⁰⁰

Date: 11/2/94

Requested by: David O'Steen

Pay to: Johnigh Little

Address: _____

Pay to: California Pro-Life Council

Address: 920 J St., Suite 1100

Sacramento, CA 95814

Explanation: _____

Special C-V project

Johnigh Little

Charge to: Performance Center No. 5

Account No. 844

Account Name: _____

Date Check Required: _____

TDW

NOV - 7 1994

Note: These charging more than one account
1st each P.C. No. and Account No.,
and amount to be charged on back of
this form.

Approved by: _____

(Manager)

By _____

(Executive Director)

**National
RIGHT TO LIFE
Committee, Inc.**

Pay to: MCLL
Address: 4349 Nicolet Ave
Mpls MN 55409

Explanation: Special Projects - phone calls

John G. Kelly

Charge to: Performance Center No. 55
Account Name: _____
Date Check Required: Today

Approved by: _____
(Manager)
FF-1 (11/81)

CHECK REQUEST NO. _____
Amount: \$ ^{50.00} ~~24.94~~ Date: 11-4-94

Requested by: _____
Mail to: _____
Address: _____

Note: When charging more than one account
list each P.C. No. and Account No.,
and amount to be charged on back of
this form.

(Executive Director)

MINNESOTA CITIZENS KILLS BARRIS CONCERNED FOR LIFE, INC. 428 NICOLLET AVENUE SOUTH MINNEAPOLIS, MINNESOTA 55409		19 23 65 3277032
PAY TO THE ORDER OF <i>National Right to Life Comm</i>		75-1027/110
AMOUNT OF CHECK <i>Five thousand no</i>		5000
DOLLARS		
<i>Jackie Schmitt</i> <i>Mary Schmitt</i>		
05148802 000050000		

Robert Bank & Trust Co.
 BANK OF MINNESOTA
 100 N. W. 1st St. Minneapolis, MN 55401

120974010931002504NICHFIELD BANK & TRUST
 PRB MPLS 0910-0008-0
 CITY
 410309842 12-09-94
 410309842 7373 7509 19

05148802
 000050000

ENDORSE HERE

FOR DEPOSIT ONLY
 NATIONAL RIGHT TO LIFE COMM, INC.
 THANK YOU & GOD BLESS YOU
 Acct # 6670042032

DO NOT WRITE, STAMP OR SIGN BELOW THIS LINE
 RESERVED FOR FINANCIAL INSTITUTION USE

EXHIBIT D

Affidavit of
David O'Steen

CARD 1: GET OUT THE VOTE MESSAGE

Hello. Your vote in tomorrow's run-off Senate election is crucial.

(WHY-CH) Wyche Fowler supports an abortion-on-demand bill, which allows abortion for any reason, even on teenage girls without their parents' knowledge. (WHY-CH) Wyche Fowler has voted to allow tax funded abortion.

Paul (COVER-DELL) Coverdell supports Georgia's parental notice law and opposes the abortion-on-demand bill. Paul (COVER-DELL) Coverdell is against using tax dollars for abortion.

Please vote tomorrow. Thank you!

CODE AS DISPOSITION Y/PRESS F2 KEY IMMEDIATELY

COMMUNICATORS: (WHY-CH) CH pronounced as in Choo Choo

COPYRIGHT INFOCISION MANAGEMENT CORPORATION - NOVEMBER, 1992

COMMUNICATORS: DISPOSITION KEY:

A = ANSWERING MACHINES
C = CHILD ANSWER (NO ADULT HOME)
W = WRONG NUMBER AND SPECIAL OUTS
Y = CONTACT

Hello. May I speak to _____?

I'm calling to remind you to vote on Tuesday in the U.S. Senate election.

There are now 4,300 abortions a day, and each abortion takes the life of a living human child.

ANN WYNIA supports abortion on demand, and **ANN WYNIA** supports using your tax dollars to pay for abortion.

ROD GRAMS is against abortion on demand, and **ROD GRAMS** opposes using your tax dollars to pay for abortion.

Your vote is important. Please vote on Tuesday. Thank you.

EXHIBIT E

Affidavit of
David O'Steen

20.04.397.0848
430.763.40.02

PAY TO THE ORDER OF
SOVRAN BANK
#054001204#
FOR DEPOSIT ONLY
OPTIMA DIRECT IN 52402
MONEY MARKET ACCOUNT BY THIS LINE
DO NOT WRITE IN THESE SPACES
RECEIVED BY OPTIMA DIRECT

NATIONS BANK
225 N. CALVERT STREET
BALTIMORE, MD
#0540-0120-4#

SIGNET BANK / NA
654006607
6412222 11-02-94 45-20-11 45-20-11

NO '94' 04
NATIONS BANK
225 N. CALVERT STREET
BALTIMORE, MD

⑈006343⑈ ⑈054000807⑈ ⑈667⑈0042008⑈ ⑈0005000000⑈

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED
DATE 11-23-94 BY 60322 UCBAW/STP

DATE 11-23-94

AMOUNT \$9,000.00

BY *John W. ...*

FOR DEPOSIT ONLY

OPTIMA DIRECT

NATIONAL RIGHT TO LIFE
COMMITTEE, INC.
419 FIRST AVE., SUITE 500
WASHINGTON, D.C. 20004

SIGNET BANK NA
WASHINGTON, DC

6343

**National
RIGHT TO LIFE
Committee, Inc.**

Amount: \$ 50,000 - Date: 11-3-94

Requested by: _____

Pay to: Optima Direct

Address: 1000 Vermont Ave NW

Washington DC 20005

Mail to: _____

Address: _____

Explanation: MN phone calls - GO TV

_____ Jul 10th 1994
_____ 11/91
_____ ad

Charge to: Performance Center No. 55

Account Name: _____

Date Check Required: _____

Account No. 840

Note: When charging more than one account list each P.C. No. and Account No., and amount to be charged on back of this form.

Approved by: _____

(Manager)

(Executive Director)

FF-1 (11/81)

20.04.397.0251

EXHIBIT F

Affidavit of
David O'Steen



419 7th Street, N.W.
Suite 800
Washington, D.C. 20004

IN PAYMENT FOR
6197

12042

15:00/540

PAY *Priority Two* *Theresa D. Apple* *Theresa D. Apple* *50* DOLLARS

TO THE ORDER OF	DATE	CHECK NO.	AMOUNT	ACTG. NO.	CHECK AMOUNT
<i>0</i> <i>Priority Two</i>	<i>1/18/04</i>	<i>12042</i>	<i>50</i>	<i>5000000000</i>	<i>50</i>

1000 Leonard Ave NW

Washington, DC 20005-0985

SIGNIFY BANK, DC

Theresa D. Apple

⑆012042⑆ ⑆054000088⑆⑆⑆ ⑆6674004⑆2008⑆ ⑆000928⑆050⑆

PART OF

25000 463 40 02

Optima
DIRECT, INC

November 9, 1994

To: David O'Steen

From: Andrew Baum

Re: Voter contact calls

David, this memo will provide you a complete cost accounting of the GOTV calls we made on your behalf. Thank you for providing Optima the opportunity to again work with you and all of our friends at Right to Life.

Original Selects:

194,895 contacts @ \$0.50 \$ 97,447.50

PA Pro-Life Federation:

92,425 contacts @ \$0.50 \$ 46,212.50

Governor Calls:

Calls for Millner in GA

22,421 contacts @ \$0.50 \$ 11,210.50

110,741 contacts @ \$0.50 \$ 55,370.50

Less GA Gov calls < \$ 11,210.50 >

RTL Gov. Total \$ 44,160.50

Sub Total \$ 187,820.50

Less Deposit Payment < \$ 95,000.00 >

Total Due Amount \$ 92,820.50

We will send you an invoice for the balance due. I will send a check for \$789.50 to the Millner campaign for the balance of their \$12,000.

Please call if you have any questions.

FOR DEPOSIT ONLY

7 6
3 4
10
22
20

RECEIVED

4-90-71 45-50-51
1989 APR 20 10:10
11821



419 7th Street, N.W.
Suite 500
Washington, D.C. 20004

PAYMENT FOR
INV. # 1060

15-80/540
11821

Pay to the order of eighty eight and 50/100

TO THE ORDER OF	DATE	CHECK NO.	ACCT NO.	CHECK AMOUNT
<i>Omega Commercial Bank</i>	<i>4-15-94</i>	<i>11821</i>		<i>9018.50</i>

*Omega Commercial Bank
215 S. 31st Street, PA
Pittsburgh, PA 15220-3509*

SIGNATURE BANK, D.C. WASHINGTON, D.C.

08085832

[Signature]

11821 11821 11821 11821 11821 11821 11821 11821 11821 11821

11821 11821 11821 11821 11821 11821 11821 11821 11821 11821

Omega Communications, Inc.
 Acacia Building #275
 875 Greentree Road
 Pittsburgh, PA 15220-3503
 412-937-0730

Invoice

DATE
 11/7/94

INVOICE #
 1060

BILL TO:

National Right To Life Committee
 Attn: Carol Long
 419 7th Street NW
 Washington D.C. 20004

P.O. NUMBER	TERMS	PROJECT
18505	NET 15	

QUANTITY	DESCRIPTION	RATE	AMOUNT
18,177	Voter Education Calls Billing Period: November 4 through November 7, 1994	0.50	9,088.50
		TOTAL	9,088.50

NO. OF "TOP" LINES



Bill National Right to Life PAC
 To: Attn: Carol Long
 419 7th Street NW, #500
 Washington, D.C. 20004

Date	Invoice
15 Nov 94	1626

BALANCE DUE: 5,232.00

PO Number	Terms	Project
	Due on recpt	PASEN

Quantity	Description	Rate	Amount
163.5	Get-out-the Vote Phone Calls	32.00	5,232.00
Calls completed November 7, 1994.		TOTAL:	5,232.00

05500 400 10 100



Dr. David O'Steen
Letter of Agreement
November 4, 1994
page three of five

6. FEES

Set-up Fee	No Charge
Daily Account Management	No Charge
Standard Reporting	No Charge
Creative/Script Writing	No Charge
Phone contact	\$ 0.50 per contact*

* A contact is defined as a presentation of the phone script, whether complete or incomplete, to any adult who answers the phone. Immediate refusals (those prospects who provide no answer to the first question) are NOT contacts.

7. FILE OWNERSHIP

Any files provided to ODI by RTL are the property of RTL and will not be made available to any third party without the written consent of RTL.

The files will be returned to RTL within 48 hours of receipt of a written request, except in the case of non payment.

8. TERM

The term of this Agreement is 1 year from the date of execution. Either party may terminate this Agreement with 30 days written notice to the other. Should either party terminate this Agreement with or without cause, RTL shall remain obligated to pay for all services performed prior to the effective date of termination.

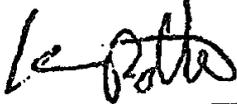
2025 NOV 04 10:00 AM

Optima
DIRECT, INC

Dr. David O'Steen
Letter of Agreement
November 4, 1994
page five of five

David, if this letter accurately states the terms of our agreement,
please sign both copies and return on to me. Thank you and wa look
forward to doing a great job for you.

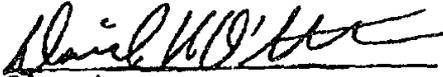
FOR OPTIMA DIRECT, INC.:



Kevin Potter
Executive Vice President

11/4/94
Date

FOR NATIONAL RIGHT TO LIFE COMMITTEE:


Signature

11/4/94
Date

David O'Steen
Name

Ex Dir
Title



National Right to Life Committee

**"Get Out and Vote"
Telemarketing Proposal**

November 4, 1994

Specific Recommendations

Omega Communications has been asked to conduct a telemarketing campaign on a list supplied by the Pennsylvania Pro-Life Federation to urge donors to "get out and vote" in the November 8th election.

This campaign will begin on Friday, November 4, 1994 and will end on Monday, November 7, 1994. Omega anticipates contacting approximately 20,000-25,000 current Federation donors during the campaign.

During the calling, Omega would utilize its standard Integrated Donor Management (IDM) approach which includes the following:

- A short script approach with non-scripted objectives
- A generation of donor comments, specifically pro-choice and/or "do not call"
- A "thank you" script for do not call dispositions
- Supervising/monitoring ratio of 8 to 1

Costs and Services

Billable Calls

Omega charges on a per billable contact basis. The following responses represent billable contacts:

- A completed call with full script
- Do not call
- Deceased

Charges for these calls will be billed \$.50 per completed call.

Acacia Bldg., Suite 275
875 Greentree Road
Pittsburgh, PA 15220
800-634-0192
Fax 412-937-0431

20 04 39 0867

EXHIBIT H

Affidavit of
David O'Steen



A - 9

INFOCISION MANAGEMENT CORPORATION
325 Springside Drive, Akron, Ohio 44333
(216) 668-1400

Information/Decision Management

DAVID O'STEEN
NATIONAL RIGHT TO LIFE
419 7TH ST NW SUITE 500
WASHINGTON DC, 20004

INVOICE : 22100
November 25, 1992

TELEMARKETING DIVISION

of
Units

Unit
Price

Sub
Total

NATIONAL RIGHT TO LIFE
Georgia Run-Off Election RL431
(C-4) Telephone Contacts
Combined Billing
Invoice for Telemarketing Services
Completed 11/18/92 to 11/24/92

Completed Calls	34282	0.50	17,141.00
Training Hours	14	12.00	168.00
Computer Charges			63.75

NET AMOUNT DUE THIS INVOICE \$17,372.75

PAYMENT IS DUE IN OUR OFFICE NO LATER THAN 14 DAYS FROM THE DATE OF THIS INVOICE. ANY PAYMENT NOT RECEIVED WITHIN 30 DAYS OF THE INVOICE DATE WILL INCUR A 1 1/2% MONTHLY FINANCE CHARGE, AND 1 1/2% EACH 30 DAYS THEREAFTER ON ANY OUTSTANDING BALANCE. PLEASE REMIT PAYMENT TO: INFOCISION MANAGEMENT

SP
Projects

A-9

National
RIGHT TO LIFE
Committee, Inc.

419 7th Street, N.W.
Suite 600
Washington, D.C. 20004

IN PAYMENT FOR
#22100

15-80/1540

6590

PAY SEVENTEEN THOUSAND THREE HUNDRED SEVENTY TWO DOLLARS

INFORMATION: THE PAYEE'S ACCOUNT NUMBER IS 0001137175

IN FOCUSION MANAGEMENT
325 SPRINGSIDE DRIVE
AKRON, OH 44333

Ann K...

SIGNET BANK
WASHINGTON, D.C.

00055908 0051000000715 #667-0042008W

OF
BANK
AKRON, OH
29

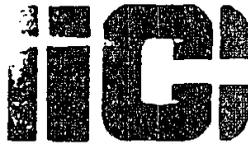
PAY TO THE
SOCIETY NATI
AKRON, OH
INFOCUSION
29

JA 31 11 9
BANKRY BATH BL
1025 BRIDGES ST.
OFFICE BR 44116



EXHIBIT G

Affidavit of
David O'Steen



A 9

INFOCISION MANAGEMENT CORPORATION
325 Springside Drive, Akron, Ohio 44333
(216) 668-1400

Information/Decision Management

DAVID O'STEEN
NATIONAL RIGHT TO LIFE
419 7TH ST NW SUITE 500
WASHINGTON DC, 20004

INVOICE : 22100
November 25, 1992

TELEMARKETING DIVISION

of
Units

Unit
Price

Sub
Total

NATIONAL RIGHT TO LIFE
Georgia Run-Off Election RL431
(C-4) Telephone Contacts
Combined Billing
Invoice for Telemarketing Services
Completed 11/18/92 to 11/24/92

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Computer Charges			63.75

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SP
Projects

A-9

national
RIGHT TO LIFE
committee, Inc.

419 7th Street, N.W.
Suite 500
Washington, D.C. 20004

IN PAYMENT FOR
#22100

18-80/5-40

6590

PAY TO THE ORDER OF **SEVENTEEN THOUSAND THREE HUNDRED SEVENTY TWO DOLLARS**

INVISION MANAGEMENT

325 SPRINGSIDE DRIVE
AKRON, OH 44337

SIGMET BANK, INC.

Ann [Signature]

⑆006590⑆ ⑆051000807⑆ ⑆667-0042008⑆ ⑆000173717⑆

PAY TO THE ORDER OF
SOCIETY NATL BANK
AKRON, OH 44302
FOR DEPOSIT ONLY
INVISION MANAGEMENT CORP.

010384
00410
JAN 23 11
SOCIETY NATL BANK
2029 DELAWARE ST.
AKRON, OH 44316



EXHIBIT I

Affidavit of
David O' Steen

